

of Law in support of its Motion to Compel Discovery Responses, and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiff asks this Court to enter an order compelling Defendants to respond to all of the outstanding discovery propounded by Plaintiff without further delay. Plaintiff also ask this Court to grant it any additional and further relief to which the Court determines Plaintiff is entitled under applicable authority.

Respectfully submitted,

Dated: September 13, 2021

By: /s/ John L. Wood

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